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March 24, 2023

VIA ECF

The Honorable Sarah Netburn
United States District Court, SDNY
40 Foley Square, Room 219
New York, New York 10007

Re: *Nike, Inc. v. StockX LLC*, Case No. 1:22-cv-00983-VEC (S.D.N.Y.)

Dear Judge Netburn:

Pursuant to Your Honor's Individual Rule III(F), Nike respectfully submits this letter regarding the requested sealed treatment of Nike's letter filed today in response to StockX's Letter Motion to Compel (Dkt. No. 144, the "Motion").

Nike's response sets forth the factual and legal bases to deny StockX's Motion. Nike's response and the exhibits attached thereto reference material that Nike and StockX have designated as "Highly Confidential – Outside Counsel's Eyes Only" pursuant to the July 14, 2022 Stipulated Protective Order entered in this case (Dkt. No. 52). This material contains particularly sensitive non-public, commercially sensitive, and proprietary information related to Nike's anticounterfeiting and brand protection measures, and StockX's "authentication" process. (*Id.* at ¶ A.3.) As such, Nike is filing portions of its response and the exhibits attached thereto under seal pursuant to Paragraph 14 of the Protective Order with appropriate redactions for material in the response that is covered by Nike's designations of confidentiality.

Accordingly, Nike respectfully requests the Court's approval of this sealed and redacted filing.

Respectfully submitted,

A handwritten signature in blue ink that reads 'Tamar Y. Duvdevani'.

Tamar Y. Duvdevani
Counsel for Plaintiff Nike, Inc.

cc: Counsel of Record via ECF